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February 4, 2019

VIA ECF AND FEDEX

Honorable Kiyo A. Matsumoto
United States District Court Judge
United States District Court for the Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Honickman, et al. v. BLOM Bank SAL*, No. 1:19-cv-00008-KAM-SMG (E.D.N.Y.)

Dear Judge Matsumoto:

We have recently been engaged to represent Defendant BLOM Bank SAL (“BLOM Bank”) in connection with the above-captioned case. We write pursuant to Rule III.E of the Court’s Individual Rules and Practices to request an extension of time on the terms set forth in the attached Stipulation and [Proposed] Order. The docket states that BLOM Bank’s answer is due on February 4, 2019, and the Stipulation provides that BLOM Bank shall answer, move to dismiss, or otherwise respond to the Complaint by June 3, 2019. The Stipulation further provides that BLOM Bank shall file its request for a pre-motion conference with respect to a contemplated motion to dismiss by May 3, 2019, and sets forth a proposed briefing schedule for that motion, subject to any modifications made by the Court at a pre-motion conference. This is the first request for an adjournment of the time to respond to the Complaint, and Plaintiffs’ counsel have agreed to it.

We appreciate Your Honor’s time and attention to this matter.

Respectfully,

/s/ Linda C. Goldstein

Linda C. Goldstein

Attachment

cc: All counsel (by ECF)